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10	Attorneys for Defendant				
11	EXPERIAN INFORMATION SOLUTIONS, I	NC.			
12	UNITED STATES DISTRICT COURT				
13	NORTHERN DISTRICT OF CALIFORNIA				
14					
15	NOEMIA CARVALHO,	Case No. C 08	8-01317-JF-HRL		
16	Plaintiff,		ON OF DEANNA L.		
17	v.	JOHNSTON IN SUPPORT OF EXPERIAN'S MOTION FOR SUMMARY JUDGMENT			
18	CREDIT CONSULTING SERVICES, ET		November 14, 2008 9:00 a.m. Courtroom 3		
19	AL., Defendant.	Date: Time: Location:			
20	Defendant.	Location.	Court troom 5		
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1	I, Dea	nna L. Johnston, declare as follows,
2	1.	I am an attorney licensed to practice in the State of California, and an associate
3	with the law f	irm Jones Day, counsel of record for defendant Experian Information Solutions, Inc.
4	("Experian")	I have personal knowledge of the following facts, and if called upon to testify, I
5	could and wo	uld competently testify to the facts stated in this declaration.
6	2.	I file this declaration in support of defendant Experian's Motion for Summary
7	Judgment.	
8		The Subject Credit Report Was Accurate
9	3.	On February 6, 2008, I attended and took the deposition of plaintiff Noemia
10	Carvalho. Co	pies of cited excerpts from Volume One of plaintiff's deposition are attached hereto
11	as Exhibit A.	
12	4.	On March 4, 2008, I attended and took the deposition of plaintiff Noemia
13	Carvalho. Co	pies of cited excerpts from Volume Two of plaintiff's deposition are attached hereto
14	as Exhibit B.	
15	5.	A true and correct copy of Exhibit 3 to plaintiff's deposition is attached hereto as
16	Exhibit C-3.	
17	6.	A true and correct copy of Exhibit 8 to plaintiff's deposition is attached hereto as
18	Exhibit C-8.	
19	7.	A true and correct copy of Exhibit 10 to plaintiff's deposition is attached hereto as
20	Exhibit C-10.	
21	8.	A true and correct copy of Exhibit 13 to plaintiff's deposition is attached hereto as
22	Exhibit C-13.	
23	9.	A true and correct copy of Exhibit 15 to plaintiff's deposition is attached hereto as
24	Exhibit C-15.	
25	10.	A true and correct copy of Exhibit 16 to plaintiff's deposition is attached hereto as
26	Exhibit C-16.	
27	11.	A true and correct copy of Exhibit 18 to plaintiff's deposition is attached hereto as
28	Exhibit C-18.	
		-2- Johnston Decl. ISO Experian's Motion for

1	12.	A true and correct copy of Exhibit 25 to plaintiff's deposition is attached hereto as
2	Exhibit C-25.	
3		Background Facts
4	13.	A true and correct copy of Exhibit 19 to plaintiff's deposition is attached hereto as
5	Exhibit C-19.	
6	14.	A true and correct copy of Exhibit 23 to plaintiff's deposition is attached hereto as
7	Exhibit C-23.	
8	15.	A true and correct copy of Exhibit 24 to plaintiff's deposition is attached hereto as
9	Exhibit C-24.	
10	16.	A true and correct copy of Exhibit 26 to plaintiff's deposition is attached hereto as
11	Exhibit C-26.	
12	17.	A true and correct copy of Exhibit 27 to plaintiff's deposition is attached hereto as
13	Exhibit C-27.	
14	18.	A true and correct copy of Exhibit 28 to plaintiff's deposition is attached hereto as
15	Exhibit C-28.	
16	19.	A true and correct copy of Exhibit 29 to plaintiff's deposition is attached hereto as
17	Exhibit C-29.	
18	20.	A true and correct copy of Exhibit 30 to plaintiff's deposition is attached hereto as
19	Exhibit C-30.	
20	21.	A true and correct copy of Exhibit 35 to plaintiff's deposition is attached hereto as
21	Exhibit C-35.	
22	22.	A true and correct copy of Exhibit 36 to plaintiff's deposition is attached hereto as
23	Exhibit C-36.	
24	23.	A true and correct copy of Exhibit 38 to plaintiff's deposition is attached hereto as
25	Exhibit C-38.	
26	24.	A true and correct copy of the Declaration of Brian Frontino in Support of
27	TransUnion's	Motion for Summary Judgment with select exhibits is attached hereto as Exhibit D.
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		-3- Johnston Decl. ISO Experian's Motion for

1	25. A true and correct copy of Experian's ACDV form produced as Exp/Car 00587 is			
2	attached hereto as Exhibit E.			
3	26. A true and correct copy of plaintiff's July 7, 2008 letter to Experian is attached			
4	hereto as Exhibit F.			
5	I declare under penalty of perjury under the laws of the State of California that the			
6	forgoing is true and correct.			
7	Executed on October 7, 2008, in San Francisco, California.			
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9	/S/ Deanna L. Johnston Deanna L. Johnston			
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	-4- Johnston Decl. ISO Experian's Motion for			